Spiorad na Mara Offshore Wind Farm

Offshore Project

Environmental Impact Assessment Report

Appendix 5.2: Response to Scoping Opinion, Volume 1c

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1 INTRODUCTION

1.1 OVERVIEW

1.1.1.1 This appendix of the Environmental Impact Assessment Report (EIAR) presents a list of responses to the Marine Directorate – Licensing Operations Team (MD-LOT) Scoping Opinion relevant to the project design, evolution, and approach to the Environmental Impact Assessment, for the proposed Spiorad na Mara Offshore Wind Farm (hereafter referred to as 'the Offshore Project'). This appendix accompanies **Chapter 5: Approach to the EIA, Volume 1a**.

1.1.2 PROJECT BACKGROUND

1.1.2.1 Spiorad na Mara Limited (hereafter referred to as 'the Applicant') is proposing to develop the Project. The Project is an offshore wind farm (OWF) that will consist of up to 60 fixed-bottom wind turbine generators (WTGs).

1.1.2.2 The Project will include both offshore and onshore infrastructure. This Offshore EIAR supports the application for the offshore components of the Project as outlined in **Chapter 1: Introduction, Volume 1a**. The offshore components of the Project (the Offshore Project) includes all infrastructure and activities located seaward of Mean High Water Springs (MHWS) within the Array Area and Offshore Cable Area of Search (OCAS) (**Figure 1.2: Offshore Project Location, Volume 1b**). Further detailed information is provided in **Chapter 3: Project Description, Volume 1a**.

1.1.2.3 The Offshore Project is situated off the northwest coast of Isle of Lewis/*Eilean Leòdhais* and the Array Area is located approximately 5-13 km offshore and is approximately 161 km^2 in size. It will comprise WTGs, foundations, Offshore Cables, Offshore Substation Platform (OSP) (if required), and Landfall. The Array Area combined with the OCAS is defined as the Offshore Project Boundary. The water depths across the Array Area range from 37 m-67 m with the southwest corner of the Array Area reaching 72 m. The proposed WTGs and fixed foundations will be located within a Turbine Area of approximately 140 km^2, within the Array Area.

1.1.3 PURPOSE OF THIS APPENDIX

1.1.3.1 This Appendix details how each relevant comment from the MD-LOT Scoping Opinion has been addressed within the Offshore EIAR (see **Table 1.1**). Environmental aspect specific Scoping Opinion responses are considered within the relevant **Chapters 6: Socio-Economics to Chapter 23: Combined Effects Assessment, Volume 2a**.

Table 1.1 MD-LOT Scoping Opinion comments and response

Consultee: Document (Date)	ID	Comment	Response/where this is addressed in the EIAR
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.1	As the Proposed Development includes both onshore and offshore elements, all infrastructure located below mean high water springs ("MHWS") will be referred to as the "Offshore Proposed Development" and all infrastructure and works located above mean low water springs ("MLWS") will be referred to as the "Onshore Proposed Development" in the Scoping Opinion. For the avoidance of doubt the Offshore Proposed Development, must include both the array area and the export cable corridor area, as outlined in blue, and hatched in grey in figure 1.1-1 of the Scoping Report. The Onshore Proposed Development, must include the onshore cable search area, cable jointing infrastructure and the onshore substation site(s), as outlined in the orange circles, and solid and hatched green area in figure 1.1-1 of the Scoping Report. Should the Developer opt to submit a separate planning application for the Onshore Proposed Development, terrestrial and marine aspects should be clearly identified in the EIA Report to ensure a straightforward process in terms of separately assessing the impacts associated with the offshore and onshore infrastructure.	As defined in **Chapter 1: Introduction**, **Volume 1a**, this EIAR pertains only to the Offshore Project. A separate application will be made for the Onshore Transmission Works (OTW) Project. The Offshore Project Boundary incorporates the Array Area and Offshore Cable Area of Search (OCAS) to MHWS. This is presented in **Figure 1.2, Volume 1b.**
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.2	The Scottish Ministers note that marine licensing covers the marine area up to MHWS and terrestrial planning control extends down to MLWS. As there is an overlap of consenting regimes in the inter-tidal zones, for some activities there may be a need for both a marine licence and planning permission.	As defined in **Chapter 1**, **Volume 1a**, this EIAR pertains only to the Offshore Project. A separate application will be made for the Onshore Transmission Works (OTW) Project. However, where appropriate, this EIAR considers the potential for effects associated with Offshore Project to interact with the onshore receptors and the OTW Project to

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			result in a potential Whole Project Effect. This approach is defined in **Chapter 5, Volume 1a** and considered in **Chapters 6 to 23**, **Volume 2a**.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.3	Section 2 of the Scoping Report states that project description is based on conceptual design information and the final project design will be identified following environmental and engineering surveys and will represent a final realistic maximum design scenario which will be presented in the EIA Report. Table 2.3-1 of the Scoping Report summaries two design options currently being considered, Landfall Substation Design and Offshore Substation Design. The Scottish Ministers advise that the EIA Report must include a full and detailed description of all options considered within the design envelope.	An explanation of the Offshore Project is presented in **Chapter 3**, **Volume 1a**. This provides the relevant parameters to inform the Maximum Design Scenario (MDS) considered in the environmental aspect assessments (**Chapters 6 to 23**, **Volume 2a**).
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.4	Section 2.5.3 of the Scoping Report states that an offshore cable corridor area of search has been developed and the final offshore cable corridor will be defined following further studies and surveys. The Scottish Ministers advise that the EIA Report must clearly describe the export cable area including the width, length, and location of each export cable corridor.	**Chapter 3, Volume 1a** provides the relevant assumptions and parameters to inform the Project Design Envelope for all Offshore Cables within the Array Area and OCAS.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.5	Section 2.5.4 and figure 1.1-1 of the Scoping Report describes the landfall areas currently being considered noting that further environmental and technical surveys will be undertaken before deciding on the final landfall location area. Section 2.7 describes the techniques being considered for the installation of the offshore export cables and final technique will be dependent on ground survey results but could include trenchless techniques such as Horizontal Directional Drilling ("HDD"), direct pipe or similar, open	**Chapter 3**, **Volume 1a** provides the relevant assumptions and parameters to inform the Project Design Envelope for landfall works. An overview of the landfall optionality considered within the design development of the Offshore Project and justification for the selected option is provided in **Chapter 4: Consideration of Alternatives**, **Volume 1a**.

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		cut trench or rock pinning. The EIA Report must clearly detail each landfall location and state the site-specific considerations for each option. The EIA Report must describe and assess the options considered for cable installation at each landfall location and must also explain the reasons for the selected installation options. The EIA Report must also outline the steps taken to mitigate any environmental impacts resulting from the cable landfall.	
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.6	Section 2.5.5 of the Scoping Report states that an onshore cable corridor area of search is defined although alternative routes may be considered. Figure 1.1-1 of the Scoping Report depicts the onshore cable corridor area of search. The Scottish Ministers advise that the EIA Report must clearly describe the onshore cable corridor area including the location, width and length.	This comment relates to the onshore elements of the Project and will be considered in the OTW Project.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.7	Section 2.6.1.2 of the Scoping Report states that the Offshore Proposed Development will include up to 66 WTGs. The Scottish Ministers note that the WTG parameters are detailed in the design envelope in table 2.6-1 and advise that the EIA Report must include a full and detailed description of all WTG parameters considered within the design envelope.	**Chapter 3**, **Volume 1a** provides the relevant parameters which define the Wind Turbine Generator (WTG) Project Design Envelope.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.8	Section 2.6.2 of the Scoping Report states that a number of fixed foundations and support structures for the WTGs are being considered including monopile, tripod, jacket, suction bucket and gravity base, the maximum design parameters are included in tables 2.6-2 through 2.6-6. The Scottish Ministers advise that the EIA Report must include a full and detailed description of all foundation and support structure designs considered within the design envelope. The Scoping Report further states that scour protection may be used if required to mitigate scour around the WTG foundation structures. For the avoidance of doubt, the use of scour protection must be	**Chapter 3**, **Volume 1a** provides the relevant assumptions and parameters which define the WTG Project Design Envelope, inclusive of foundation type and scour protection, to inform the MDS considered in the environmental aspect assessments (**Chapters 6 to 23**, **Volume 2a**).

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		assessed in the EIA Report including details on materials, quantities and location.	
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.9	Section 2.6.2.1 states that the number of array cables will vary depending on a number of parameters, the inter-array design parameters are described in table 2.6-7. Section 2.6.4 of the Scoping Report states that inter-connector cables will only be required should more than one OSP be installed. The design parameters are detailed in table 2.6-9. Section 2.6.5 states that up to three offshore export cables will be required but only if the Offshore Substation Design is taken forward. The maximum design parameters of the potential export cables are summarised in table 2.6-10 of the Scoping Report. The export cable corridors are yet to be defined and will be dependent on geophysical and geotechnical survey information. The Scoping Report further states cable installation methodology will be dependent on site-specific surveys which may include but not be limited to cable plough, jet trencher, mechanical cutting trencher, controlled flow excavator and/or mass flow excavator. The Scoping Report states that cable routes will be defined by site-specific geophysical and geotechnical survey information and will be finalised as part of the EIA process. Cables will be buried wherever possible with a number of burial options being considered, the final method of which is yet to be determined and additional cable protection will be considered. The EIA Report must provide an estimate of the anticipated likelihood of suitable burial along cable routes and be clear on the range of depths that have been considered as part of the assessment. Clear narrative must be provided within the EIA Report to show how this has been estimated. Where reliance is placed on a subsequent cable plan or cable burial risk assessment as mitigation, the	**Chapter 3**, **Volume 1a** provides the relevant assumptions and parameters which define the Project Design Envelope for the Offshore Project with respect to cable routing and burial within the Array Area and OCAS. A Cable Installation Plan will be produced to confirm routing, method of installation and contain the outputs of a formal Cable Burial Risk Assessment (CBRA).

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		EIA Report must explain how this measure will mitigate the effects, what measures are proposed for inclusion and the effectiveness and degree of confidence that can be placed on such measure. It is recommended that such plans are included alongside the EIA Report.	
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.10	Any cable protection to be used to protect inter-array, inter-connector and export cables must be assessed in the EIA Report including details on materials, quantities, and location. In addition, any seabed levelling or removal of substances or objects from on or over the seabed, required for the installation of inter-array or inter-connector cables will require consideration in the EIA Report and may also require a marine licence. Should seabed preparation involve dredging, the EIA Report must identify the quantities of dredged material and identify the likely location for deposit. The Developer may also be required to submit pre-dredge sample analysis, this should include supporting characterisation of the new and existing deposit sites.	**Chapter 3**, **Volume 1a** provides the relevant assumptions and parameters which define the Project Design Envelope for the Offshore Project with respect to seabed preparation and cable protection.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.11	With regard to boulder clearance, the Scottish Minsters advise the EIA Report must provide the anticipated estimate of boulders to be cleared (including how much uncertainty may be associated with the figures presented). Clear narrative must be provided within the EIA Report to show how this has been estimated. The Scottish Ministers direct the Developer to the Scottish Fishermen's Federation ("SFF") representation in this regard.	**Chapter 3**, **Volume 1a** provides the relevant assumptions and parameters which define the Project Design Envelope for the Offshore Project with respect to boulder clearance.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.12	Section 2.6.3 of the Scoping Report states that, should the Offshore Substation Design be adopted, the Offshore Proposed Development will include up to three OSPs, the OSP parameters are detailed in table 2.6-8 of the Scoping Report. The Scottish Ministers advise that the EIA Report must	**Chapter 3**, **Volume 1a** provides the relevant assumptions and parameters which define the Project Design Envelope for the Offshore Substation Platform (OSP).

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		include a full and detailed description of the OSP options being considered as part of the design envelope including the design, size and foundations.	
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.13	Section 2.8.1 describes the onshore export cables and associated infrastructure and states that for both design options at least one onshore substation will be required and the onshore cable routing as depicted in figure 1.1-1 applies. Onshore cable circuits will be routed across the island, preferably underground in line with National Planning Framework 4 ("NPF4") however sections of overhead line may be required. The Scoping Report further states that open-cut trenching will be the primary method of installation however HDD may also be required. The Scoping Report further identifies the need for Cable Joint Bays ("CJB") which are "typically required every 500 to 1,500m". Table 2.8-1 describes the scoping design parameters for the onshore cabling which will be dependent on local ground conditions and subject to landowner requirements and cable characteristics. The Scottish Ministers advise that the EIA Report must include full and detailed description of the onshore export cables and associated infrastructure including a worst case scenario for the number of CJBs that may be required and consideration must be given to their impact.	This comment relates to the onshore elements of the Project and will be considered in the OTW Project.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.14	Section 2.8.2 of the Scoping Report states that up to 2 onshore substations will be required dependent on the final design option. The design parameters for the onshore substations are summarised in table 2.8-2 of the Scoping Report. The location will be refined through the EIA process following further surveys and studies and in consultation with the public and stakeholders but will be as close to the selected landfall location as possible. The Scottish Ministers advise that the EIA Report must include a full and detailed	This comment relates to the onshore elements of the Project and will be considered in the OTW Project.

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		description of the onshore substation(s) and options being considered including the location, design, size and details of ancillary infrastructure.	
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.15	Section 2.9 of the Scoping Report provides an overview of the Proposed Development phases. Table 2.9-1 states that offshore pre-construction geophysical, geotechnical and benthic surveys as well as unexploded ordnance ("UXO") clearance surveys and metocean measurement campaigns will be undertaken. Table 2.9-2 states that onshore pre-construction surveys and site investigations may also be undertaken, this may include ecology, hydrology, geotechnical and geophysical surveys, and archaeological and contaminated land investigations. The Scottish Ministers advise that the EIA must describe the environmental effects, including in-combination effects, of the range of surveys which may be required. The Scottish Ministers advise that the EIA Report must include full consideration of the options which will be assessed in relation to UXO clearance, the differences amongst them and an assessment of the environmental effects of these options. In this regard, the Scottish Ministers advise that the EIA Report must include a worst case scenario of high order detonation in terms of impact and mitigation, unless there is robust supporting evidence that can be presented to show consistent performance of the preferred low order or deflagration method. The Scottish Ministers refer to the Joint SNCB/DEFRA/MS statement – Marine environment: unexploded ordnance clearance in this regard.	**Chapter 3, Volume 1a** provides the relevant assumptions and parameters which define the construction survey requirements for the Offshore Project. The relevant MDS is then assessed in each assessment **Chapter 6 to 23**, **Volume 2a**. Following initial site investigations it is not anticipated that UXO clearance will be required for the Offshore Project and therefore is not included within the MDS (see **Chapter 15: Offshore Archaeology and Cultural Heritage, Volume 2a**).
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.16	Section 2.9.2 of the Scoping Report details the operation and maintenance activities that will be considered in the EIA Report. The Scottish Ministers advise that the EIA Report must provide a full description and consideration of the nature and scope of these activities, including the types of activity, their	**Chapter 3**, **Volume 1a** provides the relevant assumptions and parameters which define the Operation and Maintenance requirements for the Offshore Project. The relevant MDS is then

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		frequency, how activities will be carried out for the Proposed Development and any anticipated cumulative impacts with neighbouring developments. Such proposed activities may require to be permitted by marine licence or planning permission issued for the Proposed Development unless an exemption applies.	assessed in each assessment **Chapter 6 to 23**, **Volume 2a**.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.17	Section 2.9.3 of the Scoping Report confirms a decommissioning programme will be prepared and submitted to Scottish Ministers in line with section 105 of the Energy Act 2004. The EIA Report must include an assessment of potentially significant effects during the decommissioning phase of the Proposed Development. Any uncertainty on the impacts upon receptors from activities during decommissioning should be clearly explained, along with the implications for the assessment of significant effects.	**Chapter 3**, **Volume 1a** provides an overview of the Offshore Project approach to decommissioning works. The effects arising during the decommissioning phase are assessed by aspect in **Chapter 6 to 23**, **Volume 2a**.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.18	The EIA Report must provide the estimate of expected residues and emissions, for example drill cuttings where considered in the design envelope. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.	**Chapter 3, Volume 1a** provides the relevant parameters of residues and emissions resulting from the Offshore Project to inform the MDS considered in the environmental aspect assessments (**Chapters 6 to 23**, **Volume 2a**).
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.19	The Scottish Ministers were content to consult on the Scoping Opinion without coordinates included. However, the coordinates must be included alongside the EIA Report detailing the outline of the offshore turbine array, export cable corridor, onshore cable corridor and infrastructure.	Coordinates of the Offshore Project have been provided within the EIAR (see **Appendix 3.3: Offshore Project Coordinates, Volume 1c**).
MD-LOT: Scoping	Paragraph 2.4.20	The Scottish Ministers recommend early consideration of nature inclusive design aspects in line with the NatureScot representation. The Scottish	The Applicant has had due consideration of Nature Inclusive Design from the outset of the

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Opinion (May 2024)		Ministers direct the Developer to the NatureScot representation on the need to understand potential impacts holistically at a wider ecosystem scale, rather than as discrete individual receptor assessments. The Scottish Ministers therefore advise that potential impacts should be given consideration across key trophic levels, particularly in relation to the availability of prey species.	project evolution and is actively exploring options for design measures to be incorporated where possible. Further consideration of Nature Inclusive Design will continue throughout the evolution of the project post-consent during the detail design stage. The effects arising from the Offshore Project are assessed in **Chapters 6 to 23**, **Volume 2a**. Where relevant these assessments have considered potential impacts holistically at a wider ecosystem scale. In addition to this, an ecosystem assessment is provided in **Chapter 23, Volume 2a**.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.21	Regulatory approvals will be required for licensable activities including all construction activities, whether as part of the original construction or any subsequent alteration or improvement, any deposit on, or removal from on or under the seabed of substances, any dredging and deposit, and any use of explosive substances. Any reference to the 'Proposed Development' in this Scoping Opinion should be taken, as appropriate, to include all activities in connection with the construction, alteration, improvement (including 'changeouts' of components) and decommissioning of the Proposed Development for which a regulatory approval or planning permission will be needed. The Developer should give consideration to all activities related to the Proposed Development which require regulatory approval or planning permission and ensure that these are applied for as appropriate.	This comment is acknowledged. Regulatory approval will be sought by the Applicant for all licensable activities, as required. The Offshore EIAR considers the whole lifecycle of the Offshore Project and the relevant activities to each environmental assessment **Chapters 6 to 23**, **Volume 2a**.

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MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.22	The Sectoral Marine Plan for Offshore Wind ("SMP") identified one of the key risk factors for the North region, where the Proposed Development is located, is risks to bird species, including collision risk and displacement, as well as potential impact to birds on migratory pathways. Consequently, this may require the consideration / submission of a derogation package under the Habitats Regulations with identification of suitable compensation measures as well as evidence of meeting all the required tests. The Developer should continue to liaise with Marine Directorate on this point going forward.	Effects associated with the Offshore Project on ornithological receptors are considered within **Chapter 14: Marine and Nearshore Ornithology**, **Volume 2a**. An **Offshore Report to Inform Appropriate Assessment (RIAA), Offshore Application: HRA Derogation Case,** and **HRA: Compensation Plan Roadmap** have been provided alongside the EIAR as separate documents in support of the application.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.23	Furthermore, the SMP identified that for N4, where the Proposed Development is located, comprehensive consultation with local stakeholders and communities should be considered in relation to impacts associated with the potential visual, landscape and seascape issues and potential noise impacts. The Scottish Ministers advise that the Developer continues to engage with the local community and encourage further engagement with local stakeholders and community councils.	This comment is acknowledged. The Applicant has undertaken consultation and engagement with relevant stakeholders throughout the pre-application stage. An overview of the consultation undertaken is provided in **Chapter 5, Volume 1a** and **Appendix 5.4: Stakeholder Consultation and Engagement**, **Volume 1c**. Information regarding the technical consultation undertaken is provided in each environmental assessment in **Chapters 6 to 23**, **Volume 2a**.
MD-LOT: Scoping	Paragraph 2.4.24	In line with the Scottish Government Language Plan 2022-27, the Scottish Ministers encourage the Developer to publicise the EIA Report and associated applications in both English and Gaelic.	Use of Gaelic placenames is provided throughout the planning application documentation. The **Non-Technical Summary,**

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Opinion (May 2024)			**Volume 1a** will be translated and made available during post-submission consultation.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.25	The Scottish Ministers note the Developer's intention to apply a 'Design Envelope' approach. Where the details of the Proposed Development cannot be defined precisely, the Developer will apply a realistic maximum adverse design scenario, as set out in section 2.4 of the Scoping Report.	**Chapter 3**, **Volume 1a** provides the relevant assumptions and parameters which define the Project Design Envelope for the Offshore Project.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.26	The Scottish Ministers advise that the Developer must make every attempt to narrow the range of options. Where flexibility in the design envelope is required, this must be defined within the EIA Report and the reasons for requiring such flexibility clearly stated. At the time of application, the parameters of the Proposed Development should not be so wide-ranging as to represent effectively different projects. To address any uncertainty, the EIA Report must consider the potential impacts associated with each of the different scenarios. The criteria for selecting the worst case and the most likely scenario, together with the potential impacts arising from these, must also be described. The parameters of the Proposed Development must be clearly and consistently defined in the application for the s.36 consent, marine licence and the accompanying EIA Report.	**Chapter 3**, **Volume 1a** provides the relevant parameters to inform the MDS considered as part of the Offshore Project and assessed in **Chapters 6 to 23**, **Volume 2a**. **Chapter 4**, **Volume 1a** provides consideration of the optionality within the Offshore Project design development and justification for the selected options, within the Project Design Envelope.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.27	The Scottish Ministers will determine the applications based on the worst case scenario. The EIA will reduce the degree of design flexibility required and the detail may be further refined in a Construction Method Statement ("CMS") to be submitted to the Scottish Ministers, for their approval, before works commence.	**Chapter 3**, **Volume 1a** provides the relevant parameters to inform the MDS considered as part of the Offshore Project and assessed in **Chapters 6 to 23**, **Volume 2a**. **Volume 3** of the EIAR provides a suite of relevant Outline Management Plans which will

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			inform the development of the Management Plans required ultimately to deliver the Offshore Project. During the post-consent stage, detail design will be undertaken to refine elements of the Offshore Project further prior to construction, in the knowledge of future pre-construction surveys. The Applicant will provide a Construction Method Statement to Scottish Ministers for approval prior to the commencement of any construction activities.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.28	It is a matter for the Developer, in preparing the EIA Report, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. If the Proposed Development or any associated activities materially change prior to the submission of the EIA Report, the Developer may wish to consider requesting a new scoping opinion.	This comment is acknowledged.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 2.4.29 – 2.4.30	The EIA Regulations require that the EIA Report include 'a description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the Developer, which are relevant to the proposed works and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'. For the avoidance of doubt, the Scottish Ministers advise that the EIA Report must include an up to date consideration of the reasonable alternatives	**Chapter 4**, **Volume 1a** provides consideration of the optionality within the Offshore Project design development and justification for the selected options, within the Project Design Envelope.

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		studied as the parameters of the Proposed Development have been refined. This includes but is not limited to the identification of the potential WTG layouts within the array area, the parameters of the export cables, the cable corridor options and the landfall location or locations. The Scottish Ministers expect this to comprise a discrete section in the EIA Report that provides details of the reasonable alternatives studied across all aspects of the Proposed Development and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.	
MD-LOT: Scoping Opinion (May 2024)	Paragraph 3.1.1	This section provides the Scottish Ministers' general comments on the approach and content of information to be provided in the Developer's EIA Report, separate to the comments on the specific receptor topics discussed in section 5 of this Scoping Opinion.	This comment is acknowledged.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 3.2.1	Matters are not scoped out unless specifically addressed and justified by the Developer and confirmed as being scoped out by the Scottish Ministers. The matters scoped out should be documented and an appropriate justification noted in the EIA report.	**Chapter 5, Volume 1a** has set out the aspects/matters considered in the EIAR. Each environmental aspect **Chapter 6 to 23**, **Volume 2a** identify elements which are scoped out from the assessment with justification, as appropriate.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 3.3.1	Any embedded mitigation relied upon for the purposes of the assessment should be clearly and accurately explained in detail within the EIA Report. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The EIA Report must identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.	The Offshore EIAR identifies the embedded mitigation measures which are necessary to avoid or reduce predicted significant adverse environmental effects of the Project, as reported in **Chapters 6 to 23**, **Volume 2a** and summarised in **Chapter 25: Summary of**

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			Offshore Mitigation/Statement of Offshore EIA Commitments, **Volume 2a**.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 3.3.2	The EIA Report should clearly demonstrate how the Developer has had regard to the mitigation hierarchy, including giving consideration to the avoidance of key receptors. The Scottish Ministers advise that where the mitigation is envisaged to form part of a management or mitigation plan, the EIA Report must set out these plans or the reliance on these in sufficient detail so the significance of the residual effect can be assessed and evaluated. This should also include identification of any monitoring and remedial actions (if relevant) in the event that predicted residual effects differ to actual monitored outcomes. Commitment to develop plans without sufficient detail is not considered to be suitable mitigation in itself.	**Chapter 5: Approach to EIA**, **Volume 1a** defines the approach to the definition and application of mitigation measures considered. The Offshore EIAR identifies the embedded mitigation measures which are necessary to avoid or reduce predicted significant adverse environmental effects of the Project, as reported in **Chapters 6 to 23**, **Volume 2a** and summarised in **Chapter 25**, **Volume 2a**.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 3.3.3	The EIA Report must include a table of mitigation which corresponds with the mitigation identified and discussed within the various chapters of the EIA Report and accounts for the representations and advice attached in Appendix I.	The Offshore EIAR identifies the embedded mitigation measures which are necessary to avoid or reduce predicted significant adverse environmental effects of the Offshore Project, as reported in **Chapters 6 to 23**, **Volume 2a** and summarised in **Chapter 25**, **Volume 2a**. Mitigation measures have been designed and consulted upon throughout the pre-application stage including stakeholder representations provided in the Scoping Opinion.
MD-LOT: Scoping	Paragraph 3.3.4	Where potential impact on the environment have been fully investigated but found to be of little or no significance, it is sufficient to validate that part of the assessment by detailing in the EIA Report, the work that has been	The potential impact of the Offshore Project on the environment have been assessed and significance of the outcomes provided within

Consultee: Document (Date)	ID	Comment	Response/where this is addressed in the EIAR
Opinion (May 2024)		undertaken, the results, what impact, if any, has been identified and why it is not significant.	each environmental aspect in **Chapters 6 to 23**, **Volume 2a**.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 3.4.1 – 3.4.3	In section 4.6.1 of the Scoping Report, the Developer proposes that the EIA Report will not include a standalone chapter assessing the risks of major accidents and disasters. Instead it is proposed that the risk of environmental disasters to the Proposed Development will be considered within the relevant chapters of the EIA Report. The Scottish Minsters are content with this approach and further advise that the Developer should make use of appropriate guidance, including the recent Institute of Environmental Management and Assessment ("IEMA") 'Major Accidents and Disasters in EIA: A Primer', to better understand the likelihood of an occurrence and the Proposed Developments susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development's potential to cause an accident or disaster. The Scottish Ministers advise that existing sources of risk assessment or other relevant studies should be used to establish the baseline rather than collecting survey data and note the IEMA Primer provides further advice on this. This should include the review of the identified hazards from your baseline assessment, the level of risk attributed to the identified hazards and the relevant receptors to be considered. The assessment must detail how significance has been defined and detail the inclusions and exclusions within the assessment. Any mitigation measures that	As proposed at the EIA Scoping Stage, major accidents and disasters are considered inherently within a number of environmental aspect chapters and presented in **Chapters 6 to 23**, **Volume 2a**. This approach is summarised in **Chapter 5**, **Volume 1a**.

Consultee: Document (Date)	ID	Comment	Response/where this is addressed in the EIAR
		will be employed to prevent, reduce or control significant effects should be included in the EIA Report.	
MD-LOT: Scoping Opinion (May 2024)	Paragraph 6.1.1	The EIA Report must be in accordance with the EIA Regulations and the Scottish Ministers draw your attention in particular to, regulation 6 of the 2017 MW Regulations and regulation 5 of the 2017 EW Regulations. In accordance with the EIA Regulations, the Scottish Ministers advise that the EIA Report must be based on this Scoping Opinion.	The Applicant has taken the Scoping Opinion into account during the development of the EIAR. In addition to this Appendix, each aspect **Chapters 6 to 23**, **Volume 2a** provides a summary of relevant Scoping Opinion responses and how they have been addressed in the EIAR.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 6.1.2	The Scottish Ministers note the need to carry out an assessment under The Conservation (Natural Habitats, &c.) Regulations 1994 and the Conservation of Habitats and Species Regulations 2017. This assessment must be coordinated with the EIA in accordance with the EIA Regulations.	An **Offshore RIAA, Offshore Application: HRA Derogation Case,** and **HRA: Compensation Plan Roadmap** have been provided alongside the EIAR as separate documents in support of the application.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 6.1.3	The Scottish Ministers acknowledge that the Scoping Report states at section 4.6.2 that a HRA Report will be undertaken separately. The Scottish Ministers recommend that the Developer submits a HRA screening report at the earliest opportunity and before the submission of the EIA Report.	The HRA Screening Report was submitted 10 September 2024 and has incorporated feedback provided by Scottish Ministers into the **Offshore RIAA, Offshore Application: HRA Derogation Case,** and **HRA: Compensation Plan Roadmap**.
MD-LOT: Scoping Opinion (May 2024)	Paragraph 6.1.4	A gap analysis template is attached at Appendix II to record the environmental concerns identified during the scoping process. This template should be completed and used to inform the preparation of the EIA Report. As part of the submission of the EIA Report the Scottish Ministers advise that	The Applicant has provided a Gap Analysis as part of the application submission documentation that follows the template provided in Appendix II.

Consultee: Document (Date)	ID	Comment	Response/where this is addressed in the EIAR
		Developer must provide confirmation of how this Scoping Opinion is reflected in the EIA Report.	

2 GLOSSARY OF TERMS AND ABBREVIATIONS

2.1.1.1 A list of key terms and acronyms used in this Appendix are provided in **Table 2.1** and **Table 2.2**.

Table 2.1 Acronyms and abbreviations

Term	Definition
EIAR	Environmental Impact Assessment Report
HDD	Horizontal Directional Drilling
HRA	Habitats Regulations Assessment
MD-LOT	Marine Directorate – Licensing Operations Team
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
OCAS	Offshore Cable Area of Search
OSP	Offshore Substation Platform
OTW Project	Onshore Transmission Works Project
OWF	Offshore Wind Farm
RIAA	Report to Inform Appropriate Assessment
UXO	Unexploded Ordnance
WTG	Wind Turbine Generators

Table 2.2 Glossary

Term	Definition
the Applicant	Spiorad na Mara Limited (the Project owner)
Array Area	The offshore area within which the offshore wind turbine generators (WTGs), associated foundations, Offshore Cables, and Offshore Substation Platform (OSP) (if required), will be located. This area encompasses the Turbine Area that will contain all above water surface infrastructure (WTGs / OSP) and an additional area within which further below water infrastructure (foundations and cables) may also be located.
Array Cables	The offshore electrical and communication cables that connect infrastructure located within the Array Area, for: • Scenario 1: Array Cables will used to connect Wind Turbine Generators (WTGs) to each other, and to connect WTGs to the OSP. • Scenario 2: Array Cables will used to connect WTGs to each other.
Array Cables to Landfall	The offshore electrical and communication cables located in the Array Area and Offshore Cables Area of Search that connect the wind turbine generators (WTGs) directly to Landfall for Scenario 2.
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the importance, or sensitivity, of the receptor or resource in accordance with defined significance criteria.

Term	Definition
Environmental Impact Assessment Report (EIAR)	The Environmental Impact Assessment Report (EIAR) prepared to assess the likely significant effects of the Project on the environment.
Export Cable	The offshore electrical and communication cables located in the Array Area and Offshore Cables Area of Search that connect the Offshore Substation Platform (OSP) (if required) to Landfall for Scenario 1.
Embedded or 'Designed-in' Mitigation	Mitigation measures to avoid or reduce environmental effects that are directly incorporated into the preferred design for the Project. This can include standard practice in accordance with or without guidance. Embedded Mitigation is considered as part of the impact assessment, before effect significance is identified
Landfall	This consists of works from offshore Horizontal Directional Drill (HDD) exit pits (located below MLWS) to onshore at the Transition Joint Bays (TJB) (located above MHWS). The infrastructure and installation methods associated with the Landfall involves both onshore and offshore components.
Offshore Application	The application for a marine licence under the Marine (Scotland) Act 2010 (between 0 and 12nm) and a Section 36 consent under the Electricity Act 1989.
Offshore Cables	Electrical and communication cables located within the Array Area and Offshore Cable Area of Search. The Offshore Cables consist of Array Cables, Array Cables to Landfall, and Export Cables.
Offshore Cable Area of Search (OCAS)	The area within which the offshore cable infrastructure between the Array Area and Landfall up to Mean High Water Springs (MHWS) will be located.
Offshore Project	The offshore components of the Spiorad na Mara offshore wind farm (the Project) located seaward of Mean High Water Springs (MHWS).
Offshore Project Boundary	The 'red line boundary' encompassing the Offshore Project.
Offshore Substation Platform (OSP)	The optional offshore substation located within the Turbine Area. Includes the platform and associated components which allows the voltage to be increased to meet onward transmission requirements.
Onshore Transmission Works (OTW) / Onshore Project	The onshore components of the Spiorad na Mara offshore wind farm (the Project) located landward of Mean Low Water Springs (MLWS). The Applicant will seek consent for the OTW Project through a separate application and so does not form part of this application.
Project	The Spiorad na Mara offshore wind farm development. This term describes the whole development, including all offshore and onshore components.
Project Design Envelope	A description of the range of possible components that make up the Project design options under consideration when the exact engineering parameters are not yet known.
Scoping Opinion	A report presenting the written opinion of the Scottish Ministers, with input from Comhairle nan Eilean Siar (CnES) for the OTW, as to the scope and level of detail of

Term	Definition
	information to be provided in the Environmental Impact Assessment (EIA) for the Project.
Turbine Area	A reduced area within the Array Area where above water surface infrastructure would be located i.e. wind turbine generators (WTG) or Offshore Substation Platform (OSP) (if required). This area has been developed and refined through stakeholder consultation and environmental assessment.
Wind Turbine Generator (WTG)	The wind turbines that generate electricity consisting of tubular towers and blades attached to a nacelle housing mechanical and electrical generating equipment